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CLASSIFICATION AND FEES
FOR CONFIRM®

Docket No. MC2002-1

AMERICAN POSTAL WORKERS UNION, AFL-CIO
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS NORMA B. NIETO
(APWU/USPS-T3-1-10)
(May 31, 2002)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal

Rate Commission, the American Postal Workers Union, AFL-CIO ("APWU")

hereby submits interrogatories and requests for production of documents to

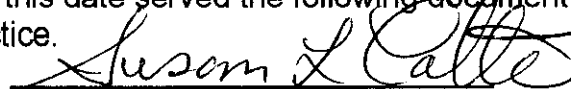USPS Witness Norma B. Nieto.

Respectfully submitted,

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Counsel for American Postal Workers Union, AFL-CIO

CERTIFICATION

I hereby certify that I have this date served the following document in
accordance with the rules of practice.

Susan L. Catler
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1300 L Street NW Suite 1200
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May 31, 2002

APWU/USPS-T3-1. What costs were involved in moving the central server site for CONFIRM from Wilkes-Barre to Raleigh to Eagan and how much did each move cost? Were the costs of moving the central server site included in the costing for CONFIRM? If so, how were they included? Were those costs included in the CONFIRM development costs? If so, how were they included?

APWU/USPS-T3-2. What is a "sunk cost" and what is the basis for excluding "sunk costs" from the costing for CONFIRM? How did you decide that some of the costs related to CONFIRM were "sunk costs"? Which costs related to CONFIRM were "sunk costs"? How much did each of these "sunk costs" items cost? Were these "sunk costs" all excluded from CONFIRM costing? If they are not included in CONFIRM costing, where are they included in overall Postal Service costing and to which account(s) are they charged?

APWU/USPS-T3-3. What is the basis for excluding from CONFIRM costs the expenditures that did not support the full production system? How did you determine which work supported the full production system? For example, at page 15, line 18 through page 16, line 2, you state that the cost of the prototype web site was not included in the CONFIRM costing because it did not support the full production system. Was there nothing about that web site that provided knowledge for building the full production system? Would the cost of that prototype web site have been undertaken if the full production system of CONFIRM had not been planned? Would the prototype web site have been undertaken if a web site had not been planned as part of CONFIRM? Which expenditures related to CONFIRM that did not support the full production system were excluded from the costing for CONFIRM? How much did each of these expenditures cost? For the expenditures excluded from CONFIRM costing because they did not support the full production system, state where they were included in overall Postal Service costing and to which account(s) they were charged?

APWU/USPS-T3-4. Which post-launch system development costs, mentioned on page 14, 2 lines through 8, have been included in your costing analysis?

APWU/USPS-T3-5. At page 15, you state that the costs of the CMOR tool are excluded from CONFIRM costing. Is the CMOR tool available for Postal Service managers and/or customer service representatives to provide information to help resolve service problems for specific mailers? If so, what proportion of the use of CMOR is for problem solving for specific mailers? During the testing of CONFIRM, has CMOR been used for problem solving for specific mailers? If it were used for solving problems for specific CONFIRM mailers, should the cost of CMOR be included in whole or in part in CONFIRM costing?

APWU/USPS-T3-6. While the CONFIRM use of shared infrastructure may not cause immediate need for expanding the field equipment infrastructure, it will take up capacity that would have otherwise been used for natural expansion of other mail processing data activities, and could impact upgrade decisions. Was this opportunity cost assessed in your analysis? If so, how was it included? If not, why not?

APWU/USPS-T3-7. Once a barcode sorter has been programmed to read PLANET codes, is there on-going updating required for this software? At page 19 you indicate that update costs are excluded from the CONFIRM costing because CONFIRM updates are done as part of preexisting update cycles. If CONFIRM is the only program being updated during a cycle, would the update be skipped?

APWU/USPS-T3-8. When the software needed for barcode sorters to read and capture the PLANET codes was initially installed as part of a preexisting update cycle, what other updates were done at the same time? In the initial installation of the software needed for barcode sorters to read and capture the PLANET codes, was testing required to determine that the installation of this software worked? If so, what testing was required? What testing was required to determine that the installation of other software or updates installed as part of the same preexisting update cycle worked? Was it necessary to reinstall the software needed for barcode sorters to read and capture the PLANET codes in any installations or for any piece of equipment? If so, where was this necessary and on what types of equipment?

APWU/USPS-T3-9. Since the software accounting system for CONFIRM is not yet complete, how were the programming costs for that system estimated? Where were those costs included in the CONFIRM costing? Who will be doing the CONFIRM accounting? Where are and what are the costs associated with doing the ongoing CONFIRM accounting? Will the CMOR be used as a tool for accounting purposes, including any use for verification of accounts? If so, how will it be used and who will use it?

APWU/USPS-T3-10. Have costs associated with uploading data from mail processing equipment at intervals other than end-of-run been included in the CONFIRM costing estimates? If not, why not? What other uses of mail processing data require or benefit from uploading data from mail processing equipment at intervals other than end-of-run?